

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
FRANCHISE GROUP, INC., et al.,	:	Case No. 24-12480 (JTD)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	<b>Objection Deadline: To Be Heard at the Hearing</b>
	:	
	:	<b>Hearing Date: December 10, 2024 at 10:00 a.m. Eastern</b>
	:	
	:	
	:	

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that the Ad Hoc Group of Freedom Lenders (the “**Freedom Lender Group**”) has filed the attached Motion to Seal (I) Its Objection to the Debtors’ DIP Motion [D.I. 274]; (II) Its Objection to the Debtors’ Critical Vendor Motion [D.I. 277]; and (III) the Bakemeyer Declaration [D.I. 278](the “**Motion to Seal**”).

**PLEASE TAKE FURTHER NOTICE** that any objections or responses to the relief requested in the Motion to Seal will be heard at the hearing on **December 10, 2024 at 10:00 a.m. Eastern** (the “**Objection Deadline**”). At the same time, copies of any responses or objections to the Motion to Seal must be served upon the undersigned counsel to the Freedom Lender Group so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION TO SEAL WILL BE HELD ON DECEMBER 10, 2024 at 10:00 a.m. (Eastern) BEFORE THE HONORABLE JOHN T. DORSEY IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS OR RESPONSES TO THE MOTION TO SEAL ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION TO SEAL WITHOUT FURTHER NOTICE. COPIES OF THE MOTION TO SEAL AND OTHER FILINGS IN THIS CHAPTER 11 CASE CAN ACCESSED FOR FREE AT [HTTPS://CASES.RA.KROLL.COM/FRG/](https://cases.ra.kroll.com/FRG/).**

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Dated: December 5, 2024

Respectfully submitted,

**FARNAN LLP**

/s/ Michael J. Farnan

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*Counsel to the Ad Hoc Group of  
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